

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MARIO LACY,)	
Plaintiff,)	C.A No. 04-11492-REK
)	
v.)	
)	
WILLIAM J. FEENEY, KENNETH)	
HEARNS, JEAN MOSES)	
ACLOQUE, and the)	
CITY OF BOSTON,)	
Defendants.)	
)	

PLAINTIFFS' JURY VERDICT FORM

1. Do you find, by a preponderance of the evidence, that the Plaintiff was subjected to an unreasonable anal cavity search in violation of the Fourth Amendment?

_____	_____
Yes	No

If you answer yes to this Question, proceed to Question 2, if you answer No, proceed to Question 6.

2. Which of the following officers do you find were involved in the anal cavity search found by you in Question 1?

	Yes	No
Feeney	_____	_____
Hearns	_____	_____
Acloque	_____	_____

3. What amount of money should be paid to Mario Lacy compensate him for the harm and/or emotional suffering caused by this anal cavity search?

\$ _____

4. How should the compensatory damages be apportioned among the defendants you found liable for the anal cavity search based on a percentage of 100%?

	Percentage
Feeney	_____
Hearns	_____
Acloque	_____

5. Do you award punitive damages to Mario Lacy against any of the above officers based on the anal cavity search you found in Question 1?

	Yes	If yes, amount	No
Feeney	_____	_____	_____
Hearns	_____	_____	_____
Acloque	_____	_____	_____

6. Do you find, by a preponderance of the evidence, that the Plaintiff was subjected to an unreasonable strip search in violation of the Fourth Amendment?

_____ Yes _____ No

If you answer yes to this Question, proceed to Question 7, if you answer No, proceed to Question 12.

7. Which of the following officers do you find were involved in the strip search found by you in Question 6?

	Yes	No
Feeney	_____	_____
Hearns	_____	_____
Acloque	_____	_____

8. Do you find, by a preponderance of the evidence, that the City of Boston had custom of tolerating illegal strip searches during drug investigations where there was no warrant, and that this custom was a moving force behind the violation of plaintiff's Fourth Amendment Rights?

Yes _____
No _____

9. What amount of money should be paid to Mario Lacy compensate him for the harm and/or emotional suffering caused by this unreasonable strip search? *(Do not award damages in question 9 if you have awarded damages in Question 3, if you did not award damages in question 3, consider Question 9)*

\$ _____

10. How should the compensatory damages be apportioned among the defendants you found liable for the strip search based on a total percentage of 100%?

	Percentage
Feeney	_____
Hearns	_____
Acloque	_____
City of Boston	_____

11. Do you award punitive damages to Mario Lacy against any of the above officers based on the strip search you found in Question 6?

	Yes	If yes, amount	No
Feeney	_____	_____	_____
Hearns	_____	_____	_____
Acloque	_____	_____	_____

12. Do you find, by a preponderance of the evidence, that the Plaintiff was subjected to excessive force in violation of the Fourth Amendment?

_____ Yes _____ No

If you answer yes to this Question, proceed to Question 13. If you answer no to this Question, proceed to Question 17.

13. Which of the following officers do you find were involved in the use of force found by you in Question 12?

	Yes	No
Feeney	_____	_____
Hearns	_____	_____
Acloque	_____	_____

14. What amount of money should be paid to Mario Lacy compensate him for the harm and/or emotional suffering caused by this use of force?

\$ _____

15. How should the compensatory damages be apportioned among the defendants you found liable for the unreasonable use of force based on a total percentage of 100%?

	Percentage
Feeney	_____
Hearns	_____
Acloque	_____

16. Do you award punitive damages to Mario Lacy against any of the above officers based on use of force you found in Question 12?

	Yes	If yes, amount	No
Feeney	_____	_____	_____
Hearns	_____	_____	_____
Acloque	_____	_____	_____

17. Do you award interest on the damages you have assessed today?

Yes _____ No _____

Respectfully Submitted,
The Plaintiff, Mario Lacy
By his attorney,

Stephen Hrones
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CERTIFICATE OF SERVICE

I, Jessica D. Hedges, hereby certify that, on this the 7th day of April, 2006, I have caused to be served a copy of this document, where unable to do so electronically, on all counsel of record in this matter.

//s// Jessica D. Hedges

Jessica D. Hedges